

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MERCER HEALTH & BENEFITS LLC,

Plaintiff,

-against-

MATTHEW DIGREGORIO, JOANNE STEED,
JADA PRESTON and LOCKTON COMPANIES,
LLC,

Defendants.

Case No.: _____

**DECLARATION OF MAGGIE
NOVO-CHAVARRY**

MAGGIE NOVO-CHAVARRY, declares pursuant to 28 U.S.C. § 1746 and subject to the penalties of perjury that the following is true and correct:

1. I am a Principal at Mercer Health & Benefits LLC (“Mercer”). Except where otherwise stated, I make this declaration based on my personal knowledge.
2. I joined Mercer in July 2015 as a Principal. In this capacity, I am responsible for managing client relationships and ensuring client retention by evaluating client risks and developing solutions to address client needs. I serve as a primary client contact for clients and address day-to-day client needs and client questions.
3. On or about January 17, 2018, I learned that Matthew DiGregorio (“DiGregorio”) JoAnn Steed (“Steed”) and Jada Preston (“Preston”), resigned their positions at Mercer to begin working at Lockton Companies.
4. Over the next few days, I contacted certain long-standing Mercer clients to inform them that DiGregorio, Steed and Preston had resigned and to prepare to transition accounts.
5. On January 19, 2018, I met with the Director of Human Resources and the Controller for a hotel client that had been serviced by Steed and Preston during their employment

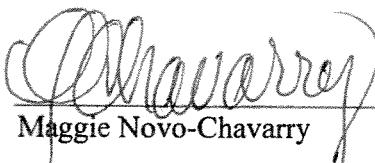
at Mercer. The purpose of the meeting was to introduce myself as the hotel's new Mercer contact and to discuss the hotel's ongoing relationship with Mercer.

6. During the meeting, I learned that Steed and Preston called the hotel client to inform the client of their departure from Mercer.

7. On January 31, 2018, I had a second meeting with the Director of Human Resources and the Controller for the hotel client. Dino Catozzo, a Principal and the Florida Sales Leader for Mercer joined me at the meeting to discuss expanding our relationship with the hotel client.

8. In our January 31st meeting, the hotel client's representatives acknowledged that they met with Steed and Preston, following Steed's and Preston's resignations from Mercer, and that Steed and Preston attempted to sell health and benefits services on behalf of Lockton Companies, which were of a type sold and provided by Mercer.

Dated: February 26, 2018
Sunrise, Florida



Maggie Novo-Chavarry